

# SCARINCI HOLLENBECK

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September 25, 2008

Via ECF Filing Only

Hon. Peter G. Sheridan, U.S.D.J.  
United States District Court, District of New Jersey  
M.L. King, Jr. Federal Bldg. & Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

10/1/08  
As Ordered  
Peter Sheridan

Re: Unex Corp. v. Industrial Bolting Tech., Inc. et al., Case No. 07-CV-6027

Dear Judge Sheridan:

I write on behalf of my clients Industrial Bolting Technologies, Inc. and Maxpro Corp., with the consent of Sean Mack, counsel for plaintiff Unex Corp. d/b/a Hytorc. I have consulted with Mr. Mack about our joint approach to the Court and the form of this letter.

As we have previously advised the Court, these parties have been engaging over the past weeks in productive settlement discussions. It appears that a mutually acceptable settlement may be reached in the near future, which would resolve this case without further involvement of the Court. However, the complexity of the case and the resultant settlement process has taken the parties longer than anticipated.

The parties have agreed that, to the extent possible, it would be beneficial to avoid incurring further expense in this action and that an extension of all deadlines and hearing dates in the proceedings is acceptable if settlement efforts can be advanced in the meantime.

Accordingly, the parties jointly request that the Court enter the enclosed Consent Order which, if entered, would:

1. Extend the deadlines for responsive pleadings and responses to motions through October 14, 2008, or later as may be ordered or provided under the Federal Rules of Civil Procedure;
2. Extend the deadlines for replies to motions through October 22, 2008;

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